

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARY L. WHITE,)	
)	
Plaintiff,)	Civil Action No. 00-CV-2466
)	
vs.)	Magistrate Judge Amy R. Hay
)	
SHAYEN A. GEORGE, M.A.,)	
)	
Defendant.)	

MOTION FOR PERMISSION TO AMEND COMPLAINT

AND NOW, comes Plaintiff, Mary L. White, by and through the undersigned attorneys, and files the following Motion For Permission to Amend Complaint:

1. On or about March 15, 2005, White learned for the first time that at the same time that George opened the secret account referenced in Paragraphs 88-91 of the Complaint, that George also opened a second secret account in the name of ACCG.

2. White seeks to add allegations concerning this second secret (ACCG) account to the Complaint. A copy of the proposed Amended Complaint is attached hereto as *Exhibit 1*, to the Brief filed concurrently with this Motion.

3. This filing of the Amended Complaint is sought without undue delay or bad faith.

4. This filing of the Amended Complaint will not cause prejudice to the Defendant.

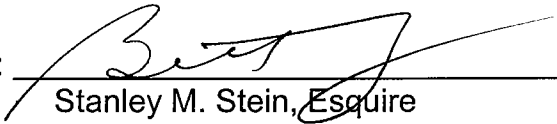
5. The filing of the Amended Complaint will not cause delay to the trial in this matter.

6. On August 29, 2005, Plaintiff's Counsel sought consent from Defendant's Counsel which was denied. A true and correct copy of this letter is attached hereto as *Exhibit 2*, to the Brief filed concurrently with this Motion.

WHEREFORE, it is respectfully requested that this Honorable Court grant this Motion to Amend and permit the filing of the Amended Complaint attached hereto as *Exhibit 1*, to the Brief filed concurrently with this Motion.

Respectfully submitted,

FELDSTEIN, GRINBERG, STEIN & McKEE

By: 
Stanley M. Stein, Esquire
PA ID. #: 10577
Beth S. Mills, Esquire
PA ID #: 61191

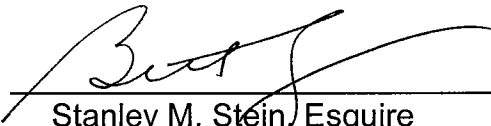
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the attached ***Motion for Permission to Amend Complaint*** was served on September 1, 2005, via first class United States mail, postage prepaid, upon the following:

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